

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CAMBRIDGE EDUCATIONAL  
CENTER, INC., d/b/a C2 EDUCATION  
CENTERS, INC.,

Plaintiff,

v.

SON HWA YI a/k/a SONIA YI and  
UNITED YOUNG ARTIST  
FOUNDATION INC.,

Defendants.

Civil Action No. 2:11-cv-07140-ES-CLW

(Electronically Filed Document)

**STIPULATION AND ORDER REGARDING  
INJUNCTIVE RELIEF AND  
SETTLEMENT**

This matter having come before this Court upon consent by the parties following settlement discussions between and among Sills Cummis & Gross, P.C., counsel for plaintiff Cambridge Educational Center, Inc., d/b/a C2 Education Centers, Inc. ("C2" or "Plaintiff"), and Philip R. Kaufman, Esq., counsel for defendants Son Hwa Yi ("Yi") and United Young Artist Foundation Inc. ("UYAF", collectively with Yi, "Defendants"); and the parties having reached a mutual agreement to fully and finally settle any and all claims they have asserted in this above-captioned litigation, or may have asserted against the other; and for good cause shown, it is hereby:

**STIPULATED AND ORDERED**, that from and including January 1, 2013 to and including December 31, 2013 (the "Injunction Period"), Yi shall be restrained and enjoined from engaging in any business activities individually, or on behalf of any business enterprise, in the area of college entrance or placement test preparation or tutoring, including the PSAT, SAT, ACT, NJASK, and Advanced Placement exams (collectively, the "Competitive Tests"), but specifically excluding teaching music or fine arts and teaching at public schools or universities

so long as such teaching does not involve test preparation or individualized tutoring for the Competitive Tests; and it is further

**STIPULATED AND ORDERED**, that Yi shall cease and desist from advertising or otherwise promoting herself, or any other business enterprise, as providing preparation or tutoring services with respect to the Competitive Tests, and within seven (7) days of entry of this Stipulation and Order Yi shall take down all of her websites and web pages promoting such services, including but not limited to her UYAF Learning web page; and it is further

**STIPULATED AND ORDERED**, that Plaintiff's claims are dismissed with prejudice against all parties; and it is further

**STIPULATED AND ORDERED**, that Plaintiff and Defendants are released from any claims that were asserted in this action; or which could be asserted from causes of action, known or unknown, under any state or federal law, arising at any time up to and including the date of this Stipulation and Order, but excluding restitution payments currently being made by Yi to C2 pursuant to Yi's agreement with the Essex County Prosecutor's Office; and it is further

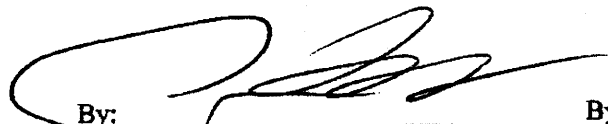
**STIPULATED AND ORDERED**, that the parties shall bear their own attorneys' fees, costs and damages; and it is further

**STIPULATED AND ORDERED**, that this Court shall retain jurisdiction over the parties to enforce this Stipulation and Order, and it is further

**STIPULATED AND ORDERED**, that the parties agree that the terms of this Stipulation are binding upon the parties upon execution by all parties.

Dated: November 9, 2012


SILLS CUMMIS & GROSS P.C.

By:   
David L. Cook

The Legal Center  
One Riverfront Plaza  
Newark, NJ 07102  
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Attorneys for Plaintiff

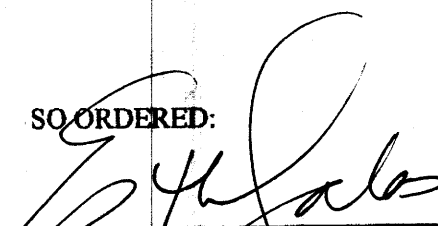
LAW OFFICES OF PHILIP R. KAUFMAN, ESQ.

By:   
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Highland Park, NJ 08904  
Tel: (732) 777-5100

Attorney for Defendants Yi and UYAF

SO ORDERED:

  
Honorable Ester Salas  
United States District Judge

11/19/12